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VIA ELECTRONIC SUBMISSION

U.S. Environmental Protection Agency
WJC West (Air Docket)
1301 Constitution Avenue NW. - Room 3334
Washington, DC 20004
Attention: Docket ID No. EPA-HQ-OAR-2013-0809

Re: Alliant Energy Corporation Comments on Notice of Data Availability (NODA): The Environmental Protection Agency's 2018 Emissions Modeling Platform; Docket ID No. EPA-HQ-OAR-2013-0809

To Whom It May Concern:

Alliant Energy Corporation (Alliant Energy) respectfully submits comments on the U.S. Environmental Protection Agency's (EPA's) NODA for the 2018 Emissions Modeling Platform. Our review indicates that there are assumptions for future activities in the 2018 Integrated Planning Model (IPM) results regarding electrical generation units (EGUs) in Alliant Energy's fleet that are inconsistent with Alliant Energy's announced plans.

Alliant Energy is a regulated, investor-owned public utility holding company. Alliant Energy has two utility subsidiaries – Interstate Power and Light Company (IPL) and Wisconsin Power and Light Company (WPL) – which are engaged primarily in the generation and distribution of electric energy and the distribution and transportation of natural gas in selected markets in Iowa, Minnesota and Wisconsin.

The following comments outline where Alliant Energy's plans for its generation fleet differ from the 2018 IPM results and provide the basis for the differences.

1. Missing New Unit

Alliant Energy respectfully requests that EPA update the IPM results to include the new Marshalltown combined-cycle natural gas facility located in Marshalltown, Iowa. IPL began construction on the facility in June 2014 and plans to begin operation in 2017. The new facility will consist of two combustion turbines and a combined cycle steam generator with a combined nominal capacity of 600 megawatts. Currently, the 2018 IPM results do not include the new Marshalltown combined-cycle natural gas facility.

IPL has obtained key regulatory approvals for the new Marshalltown facility. The Iowa Utilities Board (IUB) approved a siting certificate and established ratemaking principles on November 8, 2013. In addition, the Iowa Department of Natural Resources (IDNR) issued a prevention of significant deterioration (PSD) construction permit for the facility on April 14, 2014. The construction permit

includes a best available control technology (BACT) analysis for each pollutant projected above PSD significance levels. Table 1 provides a summary of the BACT for each applicable pollutant.

Table 1 – Summary of BACT for new Marshalltown facility

Pollutant	BACT
CO	Oxidation catalyst
CO ₂ e	Natural gas usage, efficient turbine design and an oxidation catalyst
NO _x	Low NO _x burners and a selective catalytic reduction (SCR) system
PM/PM ₁₀ /PM _{2.5}	Natural gas usage and good combustion practices
H ₂ SO ₄	Natural gas usage and good combustion practices
VOC	Oxidation catalyst

2. Incorrect Retirement Dates

Alliant Energy respectfully requests that EPA remove the units listed below from the 2018 IPM results consistent with their planned retirement dates.

- Fox Lake Unit 3 – This unit is planned for retirement by December 31, 2017; however, the IPM results do not show this unit as retiring.
- Sutherland Unit 3 – This unit is planned for retirement by December 31, 2017; however, the IPM results do not show this unit as retiring.
- Edgewater Unit 3 – This unit is planned for retirement on December 31, 2015; however, the IPM results incorrectly list the retirement date as 2018.

The above-listed retirement dates are consistent with information presented in Alliant Energy's 2014 Form 10-K filing with the U.S. Securities and Exchange Commission (SEC).

3. Incorrect Fuel Type

Alliant Energy respectfully requests that EPA revise its fuel source assumptions in the 2018 IPM results for the following units.

- M.L. Kapp Unit 2 – Alliant Energy announced on January 3, 2014 that this unit's fuel source will be converted from coal to natural gas in the second quarter of 2015. The IPM results incorrectly list the fuel source in 2018 for this unit as coal.
- Marshalltown Combustion Turbine Units 1 – 3 – Contingent upon and concurrent with the new Marshalltown combined-cycle natural gas facility project, the fuel source for these units will be natural gas only. The IPM results incorrectly list the fuel source in 2018 for this unit as oil.
- Sutherland Unit 3 – The IPM results incorrectly list the fuel source in 2018 for this unit as coal. This unit has already been converted to natural gas and has not burned coal since April 2012. Furthermore, as indicated above, this unit is planned for retirement by December 31, 2017.

4. Incorrect Emission Controls

Alliant Energy respectfully requests that EPA revise its emission control assumptions in the 2018 IPM results for certain units in the Alliant Energy fleet. Alliant Energy identified several incorrect emission control assumptions in the 2018 IPM results. The suspected errors are shaded in grey in Table 2.

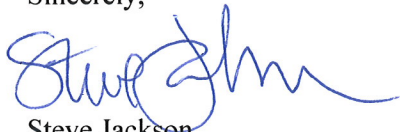
Table 2 – Incorrect IPM Emission Control Assumptions

Unit ID	Plant Name	EMF Controls	Existing NO _x Control	Existing SO ₂ Control	IPM Retrofit SO ₂ & NO _x Controls	Alliant Energy Comments
1	Burlington	Cold-side ESP + Fabric Filter	LNC3	-	Mercury Control / DSI	There is no fabric filter installed on this unit, nor are there plans to install one at this time. Furthermore, there is no plan to install DSI in the future for this unit as predicted by the IPM.
11	Emery Station	-	DLNB + H ₂ O + NH ₃	-	-	A SCR should be added to the list of EMF controls and existing NO _x controls (<i>See Title V Operating Permit 07-TV-011</i>).
12	Emery Station	-	DLNB + H ₂ O + NH ₃	-	-	
ST1	Emery Station	-	DLNB + H ₂ O + NH ₃	-	-	
4	Lansing	Hot-side ESP + Fabric Filter + SCR + ACI	LNB + NH ₃	-	Scrubber	A dry scrubber should be added to the list of existing SO ₂ controls instead of model retrofit controls because a dry scrubber is expected to commence operation in 2015.
2	Milton L Kapp	Cold-side ESP + Fabric Filter	LNC1	-	Mercury Control / DSI	There is no fabric filter installed on this unit, nor are there plans to install one at this time. A fuel-switch to natural gas is planned in 2015. No further mercury control / DSI is planned in the future at this unit as predicted by the IPM.
1	Ottumwa	Hot-side ESP + Fabric Filter + Dry Scrubber	LNC2	Dry Scrubber	Mercury Control	ACI will be utilized by the end of 2014 at this unit and should be included in the list of EMF controls. No further mercury control is planned at this unit at this time as predicted by the IPM.
3	Prairie Creek	Cold-side ESP + Fabric Filter	OFA	-	Coal Retirement	There are no fabric filters installed on these units, nor are there plans to install them at this time. However, ACI will be utilized by the end of 2014 at both units and should be included in the list of EMF controls. Alliant Energy does not plan to retire these units by 2018 as predicted by the IPM.
4	Prairie Creek	Cold-side ESP + Fabric Filter	LNBO	-	Coal Retirement	This unit has converted to natural gas and no future mercury control / DSI is planned in the future at this unit as predicted by the IPM. Furthermore, the unit is planned for retirement by December 31, 2017.
3	Sutherland	Cold-side ESP + SNCR	OFA	-	Mercury Control / DSI	
3	Edgewater	Cold-side ESP + Fabric Filter + SNCR	OFA	-	Coal Retirement	
5	Edgewater	Cold-side ESP + SCR + ACI	LNBO	-	-	A dry scrubber and fabric filter will commence operation by January 1, 2017 on this unit. Therefore, these controls should be listed in the EMF controls and existing SO ₂ controls.
CTG1	Riverside Energy Center	-	DLNB	-	-	A SCR is operating at these units and should be listed in the EMF controls and existing NO _x controls (<i>See Title V Operating Permit 154099880-P01</i>).
CTG2	Riverside Energy Center	-	DLNB	-	-	
STG1	Riverside Energy Center	-	DLNB	-	-	

Thank you for considering these comments. Questions regarding our submittal may be addressed by email to me at SteveJackson@alliantenergy.com.

Thank you for the opportunity to comment on this proposal.

Sincerely,

A handwritten signature in blue ink, appearing to read "Steve Jackson", with a stylized flourish at the end.

Steve Jackson
Manger, Environmental Services - Planning
Alliant Energy Corporate Services, Inc.

cc: Joseph Hoch, Alliant Energy